

PW

YOLO COUNTY

FLOOD CONTROL &
WATER CONSERVATION
DISTRICT



June 8, 2005

Robert Schneider, Chairman
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova CA 95670



Subject: Extension of the public input process for Basin Plan amendments to control mercury in Cache Creek

Dear Chairman Schneider,

The Yolo County Flood Control and Water Conservation District (District) respectfully requests a 90 day extension of the public input process for the proposed Basin Plan Amendments to control mercury in Cache Creek.

Regional Water Quality Control Board staff have been very responsive to our questions and comments regarding the proposed amendments and should be complimented for their efforts. However, more time is needed to continue the public input process. The most recent version of the proposed amendments (public review document), released April 13, 2005, is inadequate to achieve the stated goals of reducing mercury problems in the Cache Creek system.

The District has special knowledge and expertise of the Cache Creek system (both consultants and on staff). More time is needed so that this special knowledge and expertise can be more fully utilized in the development of the proposed Basin Plan amendments. Examples of further development that are needed:

1. **Definition of the regulated area.** The proposed amendments do not clearly define the geographic area regulated. No detailed maps of the regulated area are included, nor is a working definition provided for the terms "active channel" and "10-year flood plain" (terms used to define the regulated area). The Hg concentration in sediment, used as a trigger for regulation, is defined differently seven times (pages 16, 42, 48, 48, 49, 50, and 72).

2. **Flow and sediment loading calculations** have not been reviewed by a Certified Engineering Geologist or other experts. Sediment loading calculations and water flow measurements are central to the regulations proposed. Significant errors in loading estimates were found in the peer

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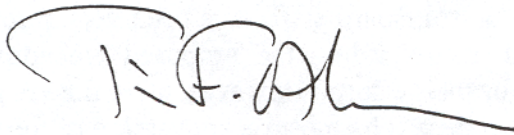
Tim O'Halloran
General Manager

review version of the proposed Basin Plan amendments. Those previous errors were corrected; however, insufficient time has been allowed for review of the current public review amendments. (For example, below 1559 cfs, the staff gauge on Cache Creek at Rumsey Bridge is considered to be inaccurate by DWR. Not enough time has been allowed to address this basic issue.)

Other inadequacies exist in the current proposed amendments. They include unclear definitions of responsible parties for both monitoring and implementation. An incomplete and preliminary cost/benefit analysis is presented as useful planning tool.

I urge the Regional Board to extend the public input period for 90 days. Deficiencies in the current proposed amendments can be addressed with the help and input of local experts. More time is needed to work together and create clear and effective amendments to the Basin Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Halloran', with a long horizontal flourish extending to the right.

Tim O'Halloran
General Manager
Yolo County Flood Control and Water Conservation District

cc: Petrea Marchand